

# EXHIBIT D

**From:** [Chris Kachouroff](#)  
**To:** [Loftus, Julie](#); [Frey, Timothy](#)  
**Subject:** 30(b)6  
**Date:** Friday, May 3, 2024 8:46:20 AM  
**Attachments:** [image.png](#)

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Julie and Timothy,

Good morning. I spoke with Lindell and the likelihood is that he will be the 30(b)6 deponent for most if not all topics. I'll be going over those today with him using your last notice. He has minor surgery this month but advised that he will largely be available and we can schedule. He said that he would prefer the depositions take place in Texas. I presume you all might agree with that venue.

I should also have our revised 30(b)6 to you as well. I've got dates filling up this month so we should probably pick a few to set aside.

I'll be in touch with you all soon.

Chris

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